

Message

From: david.parham@akerman.com [david.parham@akerman.com]
Sent: 10/31/2022 9:50:23 AM
To: Bater.Bates@prosperitybankusa.com; jg@goodmannetworks.net
CC: andrea.hartley@akerman.com
Subject: RE: Goodman funds at Prosperity

Bater,

The initial transfer of funds from Goodman Networks to provide security for a loan to Genesis was without consideration to Goodman and thus we believe a fraudulent conveyance and the funds need to be returned.

We understand that you are in the process of restructuring the loan with Genesis and are willing to release Prosperity's security interest once that is accomplished. Can you advise me as to the status of the restructuring and the timing? Goodman has an urgent need to access that money to pay for D&O insurance premiums and to pay various professional fees, including fees that have been charged by the bond trustee and its counsel, and the Ad Hoc Committee of Bond Holders, and we would much prefer to resolve this consensually and without the time and expense of litigation, but you should understand that Goodman may suffer extreme injury if it is not allowed to access this cash immediately. We will work separately with the bond holders to obtain the permissions we need from them to pay Goodman's urgent expenses.

Please advise on expected timing.

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From: Bater Bates (438) <Bater.Bates@prosperitybankusa.com>
Sent: Monday, October 31, 2022 9:02 AM
To: John Goodman <jg@goodmannetworks.net>
Cc: Parham, David (Ptnr-Dal) <david.parham@akerman.com>; Hartley, Andrea (Ptnr-Mia) <andrea.hartley@akerman.com>
Subject: RE: Goodman funds at Prosperity

[External to Akerman]

I guess this was written after we talked on the phone?

Funds were used to repay a loan the funds were security for. Bondholders then came in and gave us notice of control and pulled the available funds from all the accounts.

In negotiating with the bondholders counsel, the loan was readvanced and the funds were placed in escrow account (fbo GNet) which still secures our loan.

**Exhibit
PB 0024**

Lawrence (Bater) Bates

Managing Director

Prosperity Bank

5949 Sherry Ln., Suite 600

Dallas, Tx 75225

Phone: (214) 368-8521 | Mobile: (214) 213-9592

Email: bater.bates@prosperitybankusa.com

From: John Goodman <jg@goodmannetworks.net>

Sent: Saturday, October 29, 2022 8:03 AM

To: Bater Bates (438) <Bater.Bates@prosperitybankusa.com>

Cc: david.parham@akerman.com; andrea.hartley@akerman.com

Subject: Goodman funds at Prosperity

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Hi Bater,

Can you please provide an update to Goodman's counsel the status of the funds on deposit with Prosperity.

Last, we spoke I understood that the company requested the funds be moved into escrow and that the BH's were attempting to get control or lock up the funds.

The company has very little cash and is attempting to keep professionals paid as we work through the involuntary ch. 7 filing and needs working capital to do so.

Joh

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